

AO 91 (Rev. 11/11) Criminal Complaint

AUG - 4 2020

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

JULIA C. DUDLEY, CLERK

BY: *[Signature]*

DEPUTY CLERK

United States of America

v.

Ammie Hale

Case No. 1:20MJ111

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 26 & July 1, 2020 in the county of Tazewell in the
Western District of Virginia, the defendant(s) violated:

Code Section
18 USC 1709

Offense Description
Theft of Mail Matter by Officer or Employee

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

[Signature]

Complainant's signature

Todd C. Phillips, Special Agent, USPS-OIG

Printed name and title

telephonically.

Sworn to before me ~~and signed in my presence.~~

Date:

8/4/20

City and state:

Abingdon, Virginia

[Signature]

Judge's signature

Pamela Meade Sargent, U.S. Magistrate Judge

Printed name and title

Todd Phillips, being duly sworn, deposes and says:

1. I am a Special Agent with the United States Postal Service Office of Inspector General ("USPS-OIG"), assigned to the Roanoke, VA field office, and have been so employed for the past eight years. As part of my daily duties as a USPS-OIG Special Agent, I investigate mail theft, financial fraud, and narcotics trafficking through the United States Mail. I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center.
2. I submit this affidavit in support of a criminal complaint charging Ammie Hale (hereinafter "Hale"), with violating Title 18, United States Code, Section 1709 (Theft of mail matter by Officer or Employee).
3. The statements contained in the affidavit are based upon my personal knowledge, observations and review of records and other physical evidence obtained during my investigation, and upon my training as a USPS-OIG Special Agent. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that the defendant did knowingly violate Title 18, United States Code, Section 1709.

4. In September 2019 the USPS-OIG was first notified by the Salem, VA Veterans Affairs Medical Center ("VAMC") of four medication parcels mailed to veterans in Tazewell, VA that were never delivered. The Salem VAMC advised all four medication parcels contained controlled narcotics including Hydrocodone, Oxycodone, and Hydromorphone. During the course of the investigation from September 2019 through July 2020, the USPS-OIG received a total of 44 reports from the Salem VAMC of medication parcels mailed to veterans in Tazewell, VA that were never delivered. The USPS-OIG received 3 additional reports of medication parcels either found ripped open during processing or not delivered, that were not mailed by the Salem VAMC.

5. On February 25, 2020, a USPS-OIG Technical Operations Officer installed a covert surveillance camera at the Tazewell, VA Post Office to record video of the parcel sorting area.

6. On March 2, 2020, I was notified by the Salem VAMC that medication parcel bearing tracking number 9400 1102 0082 9239 0451 86 was never delivered to a veteran in Tazewell, VA and contained 90 tablets of Oxycodone 7.5 mg. Continuing on March 2, 2020, I exchanged covert surveillance video hard drives from the Tazewell, VA Post Office. I subsequently reviewed video recorded on February 26, 2020, the date parcel 9400 1102 0082 9239 0451 86 was expected to arrive at the Tazewell, VA Post Office for delivery. The recorded video details

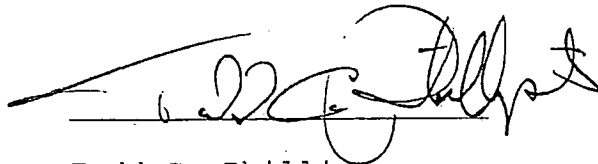
a female clerk sorting numerous parcels and scanning them "Arrival at Unit" with a scanner. The clerk is observed grabbing a white parcel bag consistent with how medication parcels from the Salem VAMC are shipped. The clerk can be seen manipulating the contents through the parcel packaging. The clerk then walks away from the sorting area with the parcel in hand and continues behind a carrier case and cabinet. A short time later, the clerk is seen returning to the parcel sorting area without the parcel in her hand. I noted the clerk did not scan the parcel tracking barcode "Arrival at Unit", which is consistent with all the medication parcels reported missing. On April 20, 2020, I showed the recorded video to the Tazewell, VA Post Office Postmaster who identified the clerk as Hale. Additionally, the Postmaster advised the area behind the carrier case and cabinet, where Hale took the parcel to, is the location the clerks keep their purses.

7. On April 29, 2020, a USPS-OIG Technical Operations Officer installed a covert surveillance camera at the Tazewell, VA Post Office to record video of the cabinet where the clerks keep their purses.

8. On July 16, 2020, I was notified by the Tazewell, VA Post Office Postmaster that a Tazewell, VA customer reported not receiving their medication parcel bearing tracking number 9202 1901 2670 9809 8933 42 and containing Xanax. On July 20, 2020, I exchanged covert

surveillance video hard drives from the Tazewell, VA Post Office. I subsequently reviewed video recorded on July 1, 2020, the date parcel 9202 1901 2670 9809 8933 42 was expected to arrive at the Tazewell, VA Post Office for delivery. Hale is observed placing her purse in the cabinet at the beginning of her shift. Approximately an hour and twenty minutes later, Hale is then seen returning to the cabinet with two white parcel bags consistent with how some medication parcels are shipped. Hale continues to open her purse, place the white parcels inside her purse, zip it closed, and close the cabinet doors. At 9:21 a.m. in the video Hale is seen retrieving her purse from the cabinet and walking out of camera view. I reviewed U.S. Postal Service records detailing Hale clocked out of work at 9:21 a.m.

WHEREFORE, based on the foregoing, I respectfully submit that there is probable cause to believe that Ammie Hale, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willingly stole mail while employed by the U.S. Postal Service in violation of Title 18, United States Code, Section 1709.



Todd C. Phillips

Special Agent

United States Postal Service

Office of Inspector General

*Sworn to me telephonically on August 4, 2020,
Camela Meade Sargent USMS*